BEFORE THE PUBLIC UTILITIES COMMISSION

OF THE STATE OF CALIFORNIA

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Order Institute Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.	Rulemaking 06-04-009 (Filed April 13, 2006) And *CEC Docket 07-OIIP-01*

COMMENTS OF CAITHNESS ENERGY, LLC

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Date: October 31, 2007

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Pursuant to the Commission's Rules of Practice and Procedure, Caithness submits its responses to the Administrative Law Judge's Ruling Requesting Comments on Allowance Allocation Issues. Caithness has responded to several broad questions posed in the Ruling. These specifically focus on management of the electric power sector and are as follows:

With regard to management of the Greenhouse gas reduction program, Caithness believes that management is best handled at either the Load Serving Entity level or the First Seller level of fuel sales to the power generators. In this manner, entities that have best management over either energy sales management or fuel delivery management will manage the GHG reduction program with a minimum of administration for the state. The program, if managed in this fashion, would also allow for maximum control and reportability of imported out-of-state electrical generation (aka in-leakage). This manner of program control would correspond most with the MACT 3 proposal previously provided by CARB. Caithness would propose that allocations for CO2 emissions would be distributed to these entities as either a free or auctioned allocation. The generators or first sellers of electricity which create GHGs from either fuel combustion (anthropologic) or from renewable means would be excluded from the

allocation program and not be required to participate in a GHG allowance program.

If the first seller of electricity is required to participate in a GHG reduction program, then Caithness believes that a free allowance distribution to those combustion source stakeholders that are actually participating in the program should be realized. Caithness believes that the allocation should be awarded based upon either heat input or energy output strategy and that all stakeholders have allocations periodically adjusted/ updated upon demonstrated operational periods and the decreasing total allocation fund. A free allocation of emission allocations is neither a new program nor has it been an unsuccessful program here in the United States. We have seen tremendous reductions in both SOx and NOx emissions by the incorporation of a free state issued allocation program followed with a robust secondary market program. It is our belief that putting a requirement on the first seller of generation to buy allocations does not necessarily make for an even playing field between all program participants nor does it necessarily ensure that use of the more power efficient generation facilities are necessarily going to be optimized.

Caithness appreciates this opportunity to comment and the Commission's consideration of the comments listed herein.

Respectfully submitted this October 31, 2007 at San Francisco, California.

Joseph Greco
Vice President-Western Region
CAITHNESS ENERGY, LLC

By *\/s/ Joseph Greco*
Joseph Greco

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CERTIFICATE OF SERVICE

I, Lisa Vieland, certify that I have on this 31st day of October 2007 caused a copy of the foregoing

COMMENTS OF CAITHNESS ENERGY, LLC

to be served on all known parties to R.06-04-009 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email and via U.S. mail to those without email service. I also caused courtesy copies to be hand-delivered as follows:

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I declare under penalty of perjury that the foregoing is true and correct. Executed this 31st day of October 2007 at San Francisco, California.

/s/ Lisa Vieland
Lisa Vieland

2854/006/X93900

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